

AUSA: Timothy J. Wyse

Telephone: (313) 226-9144

AO 91 (Rev. 11/11) Criminal Complaint

Special Agent: Caleb J. Casselman

Telephone: (517) 337-6846

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Mused Alryashy

Case: 2:20-mj-30006
Assigned To : Unassigned
Assign. Date : 1/8/2020
Description: RE: MUSED
ALRYASHY (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2016 through July 2018 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

7 U.S.C. § 2024(b)

Offense Description

Food Stamp Fraud

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: January 8, 2020

City and state: Detroit, MI

*Complainant's signature*

Special Agent Caleb J. Casselman

Printed name and title*Judge's signature*

David R. Grand, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Caleb J. Casselman, duly sworn on oath, state as follows:

1. I am a Special Agent of the United States Department of Agriculture, Office of Inspector General (USDA-OIG), assigned to the East Lansing, Michigan sub-office. Prior to this, I was employed as a Deputy Sheriff with Missaukee County Sheriff's Department from May 2008 to September 2008 and May 2009 to July 2010. I possess a Bachelor of Criminal Justice degree from Ferris State University and Master of Criminal Justice degree from Michigan State University.
2. As part of my duties as a USDA-OIG Special Agent, I conduct investigations of offenses involving Supplemental Nutrition Assistance Program (SNAP) fraud, access device fraud, money laundering, wire fraud, and other financial crimes. I have worked this investigation in conjunction with Michigan State Police (MSP). This affidavit is based on my personal knowledge, as well as information obtained from documents, electronic databases, witnesses, and other law enforcement agents involved in this investigation. The information contained in this affidavit is provided for the purpose of establishing probable cause for the search warrant as described below and does not contain all the details of the case known to me.
3. This affidavit is submitted in support of the Government's application for the issuance of a complaint for MUSED MOHAMED ALRYASHY (M. ALRYASHY) for violations of Title 7 U.S.C. §2024(b), that is, knowingly acquiring Supplemental Nutrition Assistance Program (SNAP) benefits in a manner contrary to law, specifically, by purchasing SNAP benefits from legitimate recipients for less than face value and obtaining full value from the U.S.D.A. Food and Nutrition Services Agency (FNS) as though the recipients purchased authorized food products as intended, a form of program known as "discounting," thereby obtaining more than \$5,000 in SNAP funds to which he was not entitled.

Background: Supplemental Nutrition Assistance Program (SNAP)

4. During October 2008, the name of the Federal Food Stamp Program changed to SNAP. Most people continue to refer to the program and related benefits as the Food Stamp Program and food stamp benefits respectively, and for convenience in this affidavit I will use those terms.
5. The Electronic Benefit Transfer (EBT) card is an access device within the meaning of Title 18 United States Code, Section 1029 (e)(1), in that it is a card containing a series of numbers, which can be used to obtain eligible food items under the Food Stamp Act. SNAP is funded by the USDA FNS, and administered through the State of Michigan Department of Human Services (DHS).
6. To become eligible to participate in the SNAP Program, store owners are required to complete, sign, and submit a SNAP Application for Stores form, (FNS) 252, to the USDA FNS. Stores approved to participate in the SNAP Program are issued a SNAP authorization number. To access the electronic funds on the EBT card, authorized stores are also provided with a "point of sale device" (POS), which serves to debit the SNAP account of SNAP beneficiaries in the amount of the eligible food items purchased.
7. Pursuant to the Food Stamp Act, recipients are permitted to use SNAP benefits only for eligible food items. SNAP transactions can only take place at stores authorized by USDA-FNS to accept SNAP benefits. By law, SNAP benefits cannot be exchanged or redeemed for cash; nor can they be used to obtain items such as alcoholic beverages, tobacco, vitamins, medicines, pet foods or cleaning products.
8. In February 2016, USDA-FNS approved Michigan Minimart Food Center, Inc. to accept SNAP benefits at the business address 8711 Michigan Avenue, Detroit, Michigan.

Redemption Irregularities at Michigan Minimart Food Center.

9. After analyzing a SNAP redemption database and conducting a preliminary SNAP redemption comparison, USDA-OIG in conjunction with the MSP began an undercover investigation of Michigan Minimart Food Center. The investigation involved the use of cooperating witnesses (CW's) equipped

with an audio recording device to record transactions and conversations between the CW's and Michigan Minimart Food Center personnel. During the course of our investigation, the CW's conducted numerous SNAP trafficking transactions with Michigan Minimart Food Center from August 2016 through July 2018.

10. Based on SNAP redemption activity of similar stores in the same geographical area, from March 2016 through July 2018, estimates of SNAP fraud attributed to owners and/or employees of Michigan Minimart Food Center exceed \$640,000 thousand.

The Investigation and Its Findings

11. In January 2017, M. ALRYASHY was present at Michigan Minimart Food Center when CW's exchanged SNAP benefits for cash. During the January 2017 undercover operation, AHMED ALRYASHY, son of M. ALRYASHY had a conversation with M. ALRYASHY before providing cash to the CW's in exchange for SNAP benefits. The conversation appears to be in Arabic.
12. Between August 2016 and July 2018, following the same procedure as described above, the CW's went into Michigan Minimart Food Center on numerous occasions to obtain cash for SNAP benefits. During the aforementioned transactions and other transactions at Michigan Minimart Food Center, over \$5,000 in SNAP benefits were used by Michigan Minimart Food Center in exchange for over \$2,600 cash and ineligible items.
13. In August 2018, search warrants were executed related to SNAP trafficking at Michigan Minimart Food Center, M. ALRYASHY's residence, and KHALED ALRYASHY (K. ALRYASHY) residence. M. ALRYASHY was interviewed and provided a written sworn statement. In pertinent part:

“Since early 2016, Khaled, Ahmed, Ali, and I all exchanged SNAP EBT benefits for cash. The exchange rate is roughly 50 cents on the \$1.00. On average, these type of transactions happen 5/6 times per day. I also have bought SNAP EBT cards from customers.”

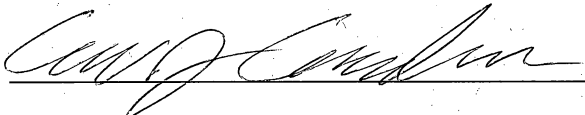
14. In August 2018 during the execution of the search warrant at M. ALRYASHY's residence, more than \$13,000 in US currency was seized by investigators.
15. In December 2019, investigators interviewed two previous customers of Michigan Minimart whom identified M. ALRYASHY for SNAP violations to include double-charging and credit with SNAP benefits at Michigan Minimart.

Conclusion

16. Based on the facts presented above, there is probably cause to believe that MUSED ALRYASHY knowingly violated Title 7 U.S.C. § 2024 (b).

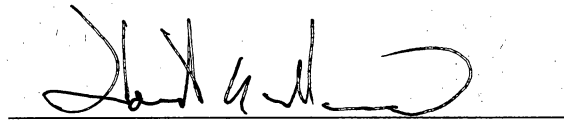
I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.

Executed by affiant this 8th day of January, 2020.



CALEB CASSELMAN
SPECIAL AGENT
USDA-OFFICE OF INSPECTOR GENERAL

Subscribed and sworn before me this 8th day of January, 2020.



DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE